

REMARKS

The application contains claims 1-19. Claim 11 has been amended and claim 19 has been added. Claim 11 has been amended to correct a typographical error. Claim 19 is a version of claim 1 which makes explicit what is already implicit, namely that the buffer memory is a band buffer memory.

This present action was made final. Applicants submit that the finality of this action is premature. In the previous action claim 3 was indicated as being patentable. In response Applicants amended claim 3 to place it into independent form. No other change was made in claim 3. In the present action, claim 3 is rejected over new art, not cited against claim 3 in the previous action. Since claim 3 was not amended, this new rejection was *not* in response to applicants' amendment as indicated at item 6 (page 7) of the present action. Withdrawal of the finality of the action is respectfully requested.

Claims 1-6, 8 and 13-18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Liguori in view of Carlsen. Claims 7 and 9-12 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Liguori in view of Carlsen and further in view of Morikawa et al. Applicants respectfully traverse these rejections and submit that the combination of Liguori and Carlsen does not provide an *a priori* case of obviousness for the claims against which they are cited. Furthermore, for similar and additional reasons, the combination of Liguori in view of Carlsen and further in view of Morikawa does not provide an *a priori* case of obviousness for the claims against which they are cited.

Liguori is cited as teaching everything in claim 1, except element d.

Carlsen is cited as teaching element d, in that "data from one element in a band is completely read prior to reading data corresponding to the portion of a second element in the band, Carlsen discloses col. 7, lines 27-38 and 56-60 that objects associated with a layer are stored and retrieved by layer." (page 3 of office action)

Firstly, applicants find it difficult to see a viable "combination" of the two references. Liguori is a method of reading and combining various layers line by line. As such, there is no need for band buffers and their complexity. Carlsen teaches doing the same combination on a band by band basis. In essence, the only difference between the two is that Carlsen stores the data in an intermediate memory (still in separated form) before combining it. However, both of them combine the data before transferring it to a buffer memory or other memory.

Applicants submit that even were the two references combined as indicated, the terms of the claims would still not be met.

For example, if, as the Examiner appears to indicate, he considers the buffer memories of claim 1 correspond to the layer buffers of Carlsen, then the combination of claim 1 would not be met since (e) the transfer of the data would not take place as claimed, the data being combined before it is transferred to the band buffer. In addition, if this identification is made then at least dependent claims 2, 4, 5, 6, 13 (and claims dependent on it) are not taught, because they are not met by the data stored on the layer memory.

If on the other hand, the band buffers of Carlsen is considered to be the buffer memory of claim 1, then act (d) of claim 1 is not carried out, since the data of the various objects is not read on a per object basis prior to writing to the band buffer. Since the data is in layers and a blender is used, it would appear that the data is read from the layer buffer in a linear fashion and not object by object. Except for a hint at col. 7, lines 33-42, Carlsen appears to be silent on this point, however, blenders of the prior art operate efficiently when the data is sent to the blender on a line by line or pixel by pixel basis.

In either case, the requirements of claim 1 are not met.

Applicants have added a new claim 19. Claim 19 makes explicit what was already implicit in claim 1, namely that the buffer is the band buffer.

As to claim 3, Applicants note that the arguments presented by the Examiner are incomplete, since the Examiner has not addressed the additional elements in claim 3, which were previously said by the Examiner to make claim 1 patentable.

Applicants could find no teaching in either Liguori nor Carlsen to read the layers in any particular order, since there does not appear to be any reason to do so. Soing so would require an extra step, and would add nothing of value to the method.

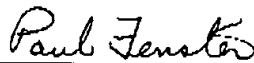
In Liguori, it appears that each of the objects is "clipped" before it is transferred or blended before it is written. In any event, the reading and writing is indicated as being line by line. In Carlsen, the entire object is first transferred to an intermediate buffer. On the intermediate buffer, the objects do not overlap. Since the blending is performed on the transferred objects, and the objects as stored in the layer buffer do not overlap, there does not appear to be any reason for transferring the objects in any order, even to the intermediate buffer. As indicated above, when the data is read from the layer buffers, it is probably read line by line for feeding into the blender. Of course, when finally transferred to the band buffer of Carlsen, the individual objects have already been blended.

UDL A03

Applicants submit that the present claims are patentable over the cited art. Notice to this effect is respectfully awaited.

Applicants have requested an interview in this application, at which the arguments submitted herewith are to be discussed.

Respectfully submitted,
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